

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA
(PITTSBURGH)**

IN RE:

Theresa L. Kepple

Debtor(s).

CHAPTER 13

CASE NO.: 21-21589-CMB

**NOTICE OF ENTRY OF APPEARANCE
AND DEMAND FOR NOTICES AND PAPERS**

PLEASE TAKE NOTICE that NewRez LLC dba Shellpoint Mortgage Servicing as servicer for U.S. Bank National Association, as Trustee, as successor to U.S. Bank Trust National Association, as Trustee, for Home Equity Loan Trust 1998-C (“U.S. Bank”), secured creditor to the above entitled Debtors by and through its undersigned counsel, hereby enters its appearance pursuant to Bankruptcy Rule 9010(b); and such counsel hereby requests, pursuant to Bankruptcy Rules 2002, 3007 and 9007 and Section 342 of the Bankruptcy Code, that copies of all notices and pleadings given of filed in the above-captioned case be given and served upon the undersigned at the following addresses and telephone/facsimile numbers:

Katilin D. Shire, Esq.
Hill Wallack LLP
1000 Floral Vale Blvd., Suite 300
Yardley, PA 19067
Telephone 267-794-6113
Facsimile 215-579-9248
Email: kshire@hillwallack.com

PLEASE TAKE FURTHER NOTICE that neither this Notice of Entry of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive

NewRez LLC dba Shellpoint Mortgage Servicing as servicer for U.S. Bank National Association, as Trustee, as successor to U.S. Bank Trust National Association, as Trustee, for Home Equity Loan Trust 1998-C (i) right to have final orders in non-core matters entered only after de novo review by a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which NewRez LLC dba Shellpoint Mortgage Servicing as servicer for U.S. Bank National Association, as Trustee, as successor to U.S. Bank Trust National Association, as Trustee, for Home Equity Loan Trust 1998-C is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: March 26, 2024

Hill Wallack LLP

By: /s/ Kaitlin D. Shire

Kaitlin D. Shire, Esq.

Hill Wallack LLP

1000 Floral Vale Blvd., Suite 300

Yardley, PA 19067

Telephone 267-794-6113

Facsimile 215-579-9248

Email: kshire@hillwallack.com

Counsel to NewRez LLC dba Shellpoint Mortgage Servicing as servicer for U.S. Bank National Association, as Trustee, as successor to U.S. Bank Trust National Association, as Trustee, for Home Equity Loan Trust 1998-C

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA
(PITTSBURGH)**

IN RE:

Theresa L. Kepple

Debtor(s)

CHAPTER 13

CASE NO.: 21-21589-CMB

CERTIFICATE OF SERVICE

I hereby certify that service was made upon all interested parties, indicated below of (i) Notice of Appearance of NewRez LLC dba Shellpoint Mortgage Servicing as servicer for U.S. Bank National Association, as Trustee, as successor to U.S. Bank Trust National Association, as Trustee, for Home Equity Loan Trust 1998-C in the manner indicated below on March 26, 2024:

Theresa L. Kepple
550 Keck Road
Butler, PA 16002

Debtor

Via Regular Mail

Office of the U.S. Trustee
1000 Liberty Avenue
Suite 1316
Pittsburgh, PA 15222
United States Trustee
Via ECF

Shawn N. Wright
7240 McKnight Road
Pittsburgh, PA 15237

Counsel for Debtor

Via ECF

Ronda J. Winnecour
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219
Chapter 13 Trustee
Via ECF

By: /s/ Kaitlin D. Shire

Kaitlin D. Shire, Esq.,

Attorney ID 324226

Hill Wallack, LLP

1000 Floral Vale Blvd., Suite 300

Yardley, PA 19067

Telephone 267-794-6113

Facsimile 215-579-9248

Email: kshire@hillwallack.com